

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:)
) CHAPTER 13
CHANDRA KAYE ALLEN-CAMPBELL) CASE NO.: 20-67115-LRC
)
)
DEBTOR.)

**CHAPTER 13 TRUSTEE'S
OBJECTION TO CONFIRMATION & MOTION TO DISMISS**

Melissa J. Davey, Chapter 13 Trustee, objects to confirmation of the plan and moves to dismiss this case pursuant to 11 U.S.C. Section 1307(c) for the following reasons:

1. The Trustee requests proof that Debtor has paid the post-petition mortgage payments for Debtor's residence in order to determine whether the Plan complies with 11 U.S.C. Section 1325(a)(6).
2. Due to a change in circumstances since filing, Schedules I and J do not correctly reflect the current financial situation, preventing the Trustee from evaluating feasibility. 11 U.S.C. Section 1325(a)(6). Debtor no longer receives a contribution of \$300.00 per month from her son.
3. The Chapter 13 Plan fails to provide for payment of interest to the Georgia Department of Labor in possible violation of 11 U.S.C. Section 1325(a)(5) and *Till v. SCS Credit Corp.*, 541 U.S. 465 (2004).

Wherefore, the Trustee moves this Honorable Court to consider the above objections at the confirmation hearing, deny confirmation of the Chapter 13 plan, dismiss the case pursuant to 11 U.S.C. Section 1307(c), and for such other and further relief that this Court deems just and proper.

Dated: August 04, 2020

/s/Melissa J. Davey

Melissa J. Davey
Chapter 13 Trustee
GA Bar No. 206310
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CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing Chapter 13 Trustee's Objection to Confirmation & Motion to Dismiss using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

Cha'Ron A. Ballard theballardlawgroup@gmail.com,
courtnotices@blglawgroup.com;R46072@notify.bestcase.com
Lucretia Lashawn Scruggs GAECFNotifications@logs.com, lscruggs@logs.com

I further certify that on this day I caused a copy of this document to be served via United States First Class Mail on the following parties at the address shown for each:

DEBTOR(S):

CHANDRA KAYE ALLEN-CAMPBELL
2834 WARD LAKE WAY
ELLENWOOD, GA 30294

Dated: August 04, 2020

/s/Melissa J. Davey
Melissa J. Davey
Chapter 13 Trustee
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